

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ABELARDO MORA,

07 CV 8168

Plaintiff,

-against-

**ANSWER**

UNITED COLLECTION BUREAU, INC.,

**Judge Cote**

Defendant.

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Defendant, UNITED COLLECTION BUREAU, INC. by its attorney Arthur Sanders, answer plaintiff's complaint as follows:

1. Defendant denies the allegation contained in Paragraph "1" of the Complaint.

2. Defendant denies knowledge or information sufficient to form a belief with respect to the truth of the allegations contained in Paragraph "2" of the Complaint.

3. Defendant admits the allegation contained in Paragraph "3" of the Complaint.

4. Defendant admits the allegation contained in Paragraph "4" of the Complaint.

5. Defendant denies knowledge or information sufficient to form a belief with respect to the truth of the allegations contained in Paragraph "5" of the Complaint.

6. Defendant admits the allegation contained in Paragraph "6" of the Complaint.

7. Defendant denies knowledge or information sufficient to form a belief with respect to the truth of the allegations contained in Paragraph "7" of the Complaint.

8. Defendant denies knowledge or information sufficient to form a belief with respect to the truth of the allegations contained in Paragraph "8" of the Complaint.

9. Defendant denies knowledge or information sufficient to form a belief with respect to the truth of the allegations contained in Paragraph "9" of the Complaint.

10. Defendant admits the allegation contained in Paragraph "10" of the complaint.

11. Defendant admits accessing a credit report on the plaintiff but otherwise denies the allegations contained in Paragraph "11" of the Complaint.

12. Defendant denies the allegation contained in Paragraph "12" of the Complaint.

13. Defendant admits that its representative had a conversation with the plaintiff but otherwise denies the allegation contained in Paragraph "13" of the Complaint.

14. Defendant admits that its representative had a conversation with the plaintiff but otherwise denies the allegation contained in Paragraph "14" of the Complaint.

15. Defendant admits that its representative had a conversation with the plaintiff but otherwise denies the allegation contained in Paragraph "15" of the Complaint.

16. Defendant denies knowledge or information sufficient to form a belief with respect to the truth of the allegations contained in Paragraph "16" of the Complaint.

17. Defendant denies knowledge or information sufficient to form a belief with respect to the truth of the allegations contained in Paragraph "17" of the Complaint.

18. Defendant admits that it did close its file on this account but otherwise denies knowledge or information sufficient to form a belief with respect to the truth of the allegations contained in Paragraph "18" of the Complaint.

19. Defendant denies knowledge or information sufficient to form a belief with respect to the truth of the allegations contained in Paragraph "19" of the Complaint.

20. This allegation is a recitation of applicable law and does not require a response.

21. Defendant denies the allegation contained in Paragraph "21" of the Complaint.

22. Defendant denies the allegation contained in Paragraph "22" of the Complaint.

23. Defendant denies knowledge or information sufficient to form a belief with respect to the truth of the allegation contained in Paragraph "23" of the Complaint.

24. Defendant denies the allegation contained in Paragraph "24" of the Complaint.

25. Defendant denies the allegation contained in Paragraph "25" of the Complaint.

26. Defendant denies the allegation contained in Paragraph "26" of the Complaint.

27. Defendant denies the allegation contained in Paragraph "27" of the Complaint.

28. Defendant denies knowledge or information sufficient to form a belief with respect to the truth of the allegation contained in Paragraph "28" of the Complaint.

29. Defendant denies the allegation contained in Paragraph "29" of the Complaint.

30. Defendant denies the allegation contained in Paragraph "30" of the Complaint.

31. Defendant denies the allegation contained in Paragraph "31" of the Complaint.

32. Defendant denies the allegation contained in Paragraph "32" of the Complaint.

WHEREFORE, defendant, United Collection Bureau, Inc., requests judgment dismissing the complaint with prejudice and denying all requested relief therein, together with such other and further relief as the Court deems just and proper, including costs and reasonable attorneys' fees.

Dated: Spring Valley, New York  
October 11, 2007

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CERTIFICATE OF SERVICE

I hereby certify that on October 11, 2007 the foregoing document was filed with the Clerk of the Court and served in accordance with the Federal Rules of Civil Procedure, and/or the Southern District's Local Rules, and or the Southern District's Rules On Electronic Service upon the following parties and participants:

Manhattan Legal Services

LeBoeuf, Lamb, Greene & MacRae LLP

/S/  
Arthur Sanders